POTOMAC ELECTRIC POWER COMPANY

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KATHLEEN B. DEWEESE
ASSISTANT GENERAL COUNSEL

July 26, 1985

Kermit Rader, Esq.
Office of Regional Counsel
U.S. Environmental Protection Agency
841 Chestnut Building
Philadelphia, Pennsylvania 19107

Dear Kermit:

Enclosed please find the latest revision to the Clean-up Plan. Upon receipt of the Consent Order as revised, I will expedite the signature process.

Many thanks for your continued cooperation.

Sincerely yours,

cc: Kathie Stein, Esq.

ATTACHMENT B

ORIGINAL (Red)

CLEAN-UP PLAN

UNITED RIGGING & HAULING, INC.

SUPERFUND SITE

Originally Dated
May 29, 1985

Revision #1
June 13, 1985

Revision #2
June 25, 1985

Revision #3
July 16, 1985

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GENERAL SITE MANAGEMENT CONSIDERATIONS

1. Control soil erosion and stormwater runoff in accordance with state requirements. Provide 24 hour per day site security to ensure limited access to contaminated areas. Maintain dams, sediment traps and diking to prevent recontamination of clean areas, storage areas and storm sewers. Remove these devices at the completion of the project.

2. Control of fugitive dust emissions during all phases of the response actions.

3. Submit for OSC approval the name(s), address(es) and telephone number(s) of any person who will assist in or conduct such activities and the facilities at which such substances will be treated, stored or disposed of.

4. Submit for OSC approval a written safety plan describing occupational safety measures to be implemented at the site during all response actions.

5. Submit for OSC approval a plan of equipment decontamination. The plan will address storage of material slated for retention and material stored for disposal.

6. Submit for OSC approval a spill prevention control and countermeasure plan for the site in accordance with 40 CFR 112.

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7. Submit for OSC approval a traffic control plan to ensure that clean areas are not recontaminated.

8. Furnish the OSC, upon request and/or as appropriate, all information generated by and/or relating to the response actions approved under this plan, including, but not limited to, sample results, identities of contractor(s) used to perform response actions, copies of manifests. OSC must approve contractor(s) hired by respondent.

9. Submit sample results to the OSC within 24 hours of the receipt of the results.

10. Within 24 hours of the completion of the response actions described herein, notify the OSC of such completion and furnish the OSC with a report establishing that all response actions were performed in accordance with the requirements of the order.

11. Grant the OSC, his designee, any Maryland environmental regulatory official, and any EPA official, contractor, agent or authorized representative access to the site at all times to monitor response activities at the site, to take samples, to inspect the site, and to take other actions, which, are necessary to ensure compliance with the order or to protect the public health, welfare or the environment, as authorized by Section 106(a) of CERCLA, 42 U.S.C. Section 9606(a), and Section 300.65 of the NCP, 40 CFR 300.65.

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12. Removal actions pursuant to this plan should remove soils containing PCBs which exceed "background" levels. For purposes of this plan, "background" is defined as follows:

For Area A, 5-10 ppm PCB

For Area B, 15 ppm PCB

For Area C, 15 ppm PCB

For Area D, 15 ppm PCB

For Area E, 5-10 ppm PCB

For Area F, 1-3 ppm PCB

13. A number of removal actions in this plan require approval of the OSC. Such approval shall be based on good engineering practices, and shall not be inconsistent with the National Contingency Plan.

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WORK PLAN

Area A

PEPCO Transformer Storage Area (Inside the Fence)

1. Remove mineral oil transformers.

   a. Label transformers as to PCB contamination category, using test results from EPA and Maryland.

   b. Sort transformers according to

      0-49 ppm PCB

      50-499 ppm PCB

      ⩾500 ppm PCB

   Units 0-49 ppm PCB:

   c. Units 0-49 ppm will be drained of all free flowing oil and the exterior of the transformer wiped down on site. The liquids will go to the Morgantown power plant for high efficiency boiler incineration in accordance with applicable state and federal regulations at COMAR 10.51, and 40 CFR 761.60. The drained transformers will then be unregulated and will be disposed of directly from the United Rigging site.

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Units 50-499 ppm PCB:

d. Units 50-499 ppm PCB will be drained of all free flowing oil, flushed with mineral oil, drained of flush material, and the exterior of the transformer wiped down on site. Mineral oil will go to the Morgantown power plant for high efficiency boiler incineration in accordance with applicable state and federal regulations at COMAR 10.51, and 40 CFR 761.60. The drained transformers will then be unregulated and will be disposed of directly from the United Rigging site.

Units ≥500 ppm PCB:

e. All units ≥ 500 ppm PCB will be wiped down, moved to Benning transformer shop for disposal packaging and then to the Benning PCB containment building. Removal and ultimate disposal will be in accordance with applicable EPA, DOT, Maryland and District of Columbia regulations.

General

f. The above activities will be performed in a cleaning area constructed with proper containment with a design and location acceptable to the OSC. Liquid and solid clean up materials will be contained and disposed of according to federal and state regulations.
All material moved off the site will be manifested, transported and disposed of in accordance with applicable District of Columbia, Maryland and federal regulations.

2. Clean the Surface Area Inside the Area A Fence.

a. Take core samples (including 4" below the macadam) on a 25' grid and analyze in accordance with 40 CFR 136 and EPA method 608, with QA/QC, lab protocol, and split samples approved by OSC.

b. Macadam and soil containing PCB in excess of background levels will be cleaned with standard steam and detergent industrial clean-up procedure or removed and disposed of in accordance with applicable federal and state regulations in accordance with OSC recommendations. Rags, brushes and liquids will be disposed of in accordance with 40 CFR 761.60 (PCB disposal regulation).

c. Restore and Secure Area A. Restore the area to an acceptable surface, slope and grade.

Area B

Electric Equipment Corporation of Virginia

Transformer Storage Area

1. Remove and transport all EEC transformers from the United Rigging site to the EEC storage site in Lorton, VA. Transport and storage will be in accordance with DOT, EPA, Maryland and Virginia regulations. EPA has agreed to move expeditiously to encourage EEC to remove EEC transformers within 30 days of plan approval. In the event EEC does not comply, EPA will remove the EEC transformers using EPA CERCLA removal authority and funds.

2. Sample the area.

   a. The EPA and Maryland have analyzed soil samples from Area B.

   b. Take samples of soil and any other material on a 10' grid. Analyze in accordance with 40 CFR 136 and with EPA method 608, with QA/QC, lab protocol, and split samples approved by OSC.

3. On the basis of the samples taken above, if contaminated soil or other material is detected at greater than the background level, construct a temporary PCB contaminated soil and material storage area at a location and design approved by the OSC. Move contaminated soil and material into the temporary storage area.

4. Remove any contaminated soil and material from the temporary storage area as accumulated and transport to EPA approved PCB disposal sites in accordance with applicable federal and state regulations. (49 CFR 387, 40 CFR 761, COMAR 10.51.04.)

5. Restore and secure Area B. Restore site to an acceptable slope and grade with material approved by the OSC. Secure the area to prevent recontamination. Control soil erosion and stormwater runoff in accordance with Maryland requirements. Provide 24 hour per day site security to ensure limited access to decontaminated areas.

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Area C

Transformer Breakdown Area

* EPA sampling thus far does not indicate that dioxin is present in this area and therefore no dioxin testing or cleanup is part of the Work Plan.

1. Clean and remove PCB debris.

   a. Construct a cleaning area with proper containment with a design and location acceptable to the OSC. Liquid and solid clean up materials will be contained and disposed of according to Federal and State regulations. EPA has indicated that much of this work already has been accomplished.

   b. Remove, transport and dispose of loose PCB contaminated trash at an EPA approved disposal site in accordance with applicable federal state regulations. EPA has indicated that most of this work has been accomplished.

2. PCB Testing and Clean-Up.

   a. PCB Soil Sampling Plan. Core samples will be taken on a 25' grid. Sampling will be in accordance with 40 CFR 136 and analysis will be

in accordance with EPA method 608, with QA/QC, lab protocol, and split samples approved by OSC.

(1) Samples shall be taken at the following depths:

(a) 4-12 inches

(b) 12-24 inches

(2) If sample results demonstrate the presence of PCB at greater than background in the deepest composite core at any sampling station, additional samples will be taken at increasing depths until no PCB's at greater than background are detected.

(3) The above sample data will be used to produce a three dimensional PCB soil contamination contour map of Area C.

b. Subject to the OSC's approval of the completed contour map, all soil present in Area C and identified by the contour map as containing PCB at greater than background levels, shall be excavated and stored in the temporary storage area. Contaminated soil will be removed from the temporary storage area as accumulated and transported to EPA approved PCB disposal sites in accordance with applicable federal and state regulations. (49 CFR 387, 40 CFR 761, COMAR 10.51.04.) The final excavation plan will be coordinated with the OSC. Excavation will be performed as expeditiously as possible and the area will be protected from erosion during excavation.

c. Restore and secure Area C. Restore site to an acceptable slope and grade. Secure the area to prevent recontamination. Control soil erosion and stormwater runoff in accordance with Maryland requirements. Provide 24 hour per day site security to ensure limited access to decontaminated areas.

Area D

(Isolated Contaminated Unpaved Areas)

1. Metal Decontamination and Trash Removal.

   a. Decontaminate metal pieces with standard industrial detergent cleaning.

   b. Move metal pieces and debris from Area D to a non-contaminated area on site.

   c. Remove all trash with detectable PCB to a licensed hazardous waste disposal site.

   d. EPA has indicated that most metal decontamination and removal has been completed.

2. PCB Testing and Clean-Up.

a. Move visible traces of contaminated soil to the temporary storage area. Contaminated soil will be removed from the temporary storage area as accumulated and transported to EPA approved PCB disposal sites in accordance with applicable federal and state regulations. (49 CFR 387, 40 CFR 761, COMAR 10.51.04.)

b. Take 4" core samples on a 50' grid. Analyze in accordance with 40 CFR 136 and EPA method 608, with QA/QC, lab protocol, and split samples to be approved by the OSC.

c. Remove all contaminated soil identified in the sampling program to contain PCBs in excess of background levels. Store this material in the temporary storage area on site. Contaminated soil will be removed from the temporary storage area as accumulated and transported to EPA approved PCB disposal sites in accordance with applicable federal and state regulations. (49 CFR 387, 40 CFR 761, COMAR 10.51.04.)

d. Restore and secure Area D. Restore site to an acceptable slope and grade. Secure the area to prevent recontamination. Control soil erosion and stormwater runoff in accordance with Maryland requirements. Provide 24 hour per day site security to ensure limited access to decontaminated areas.

Area E

(All Remaining Paved Areas on the United Rigging Site)

1. Take core samples (including 4" below the macadam) on a 25' grid and analyze in accordance with 40 CFR 136 and EPA method 608, with QA/QC, lab protocol, and split samples approved by OSC.

2. Macadam and soil containing PCB in excess of background levels will be cleaned with standard steam and detergent industrial clean-up procedure or removed and disposed of in accordance with applicable federal and state regulations in accordance with OSC recommendations. Rags, brushes and liquids will be disposed of in accordance with 40 CFR 761.60 (PCB disposal regulation).

3. Restore and Secure Area E. Restore the area to an acceptable surface, slope and grade.

Area F

(Drains, Outfalls, and Storm Sewers)

1. Decontaminate the drains and sewer pipes in accordance with OSC recommendations.

2. Remove visible traces of contaminated sediment.

   a. Divert any drainage and pump the area dry.

   b. Excavate visible contaminated sediments and move to drying bed on site.

c. Dry the excavated sediment and move to temporary storage on site. Contain water and dispose of in accordance with applicable federal and state regulations.

d. Contaminated soil will be removed from the temporary storage area as accumulated and transported to EPA approved PCB disposal sites in accordance with applicable federal and state regulations. (40 CFR 387, 40 CFR 761, COMAR 10.51.04.)

e. Analyze the collected liquid in accordance with 40 CFR 136, with QA/QC, lab protocol, and split samples to be approved by the OSC.

3. Sample the sediments every 10' from the outfall down the center line of the swales. Analyze in accordance with 40 CFR 136 and EPA method 608, with QA/QC, lab protocol, and split samples to be approved by the OSC.

4. Remove all sediment with PCB in excess of background levels from outfall areas. Dry the sediment. Contain water and dispose of in accordance with applicable federal and state regulations. Move the dried sediment to the temporary storage area. Analyze in accordance with 40 CFR 136 and EPA method 608, with QA/QC lab protocol, and split samples to be approved by the OSC.

5. Restore and secure Area F. Restore the area to an acceptable surface, slope and grade.

Area G

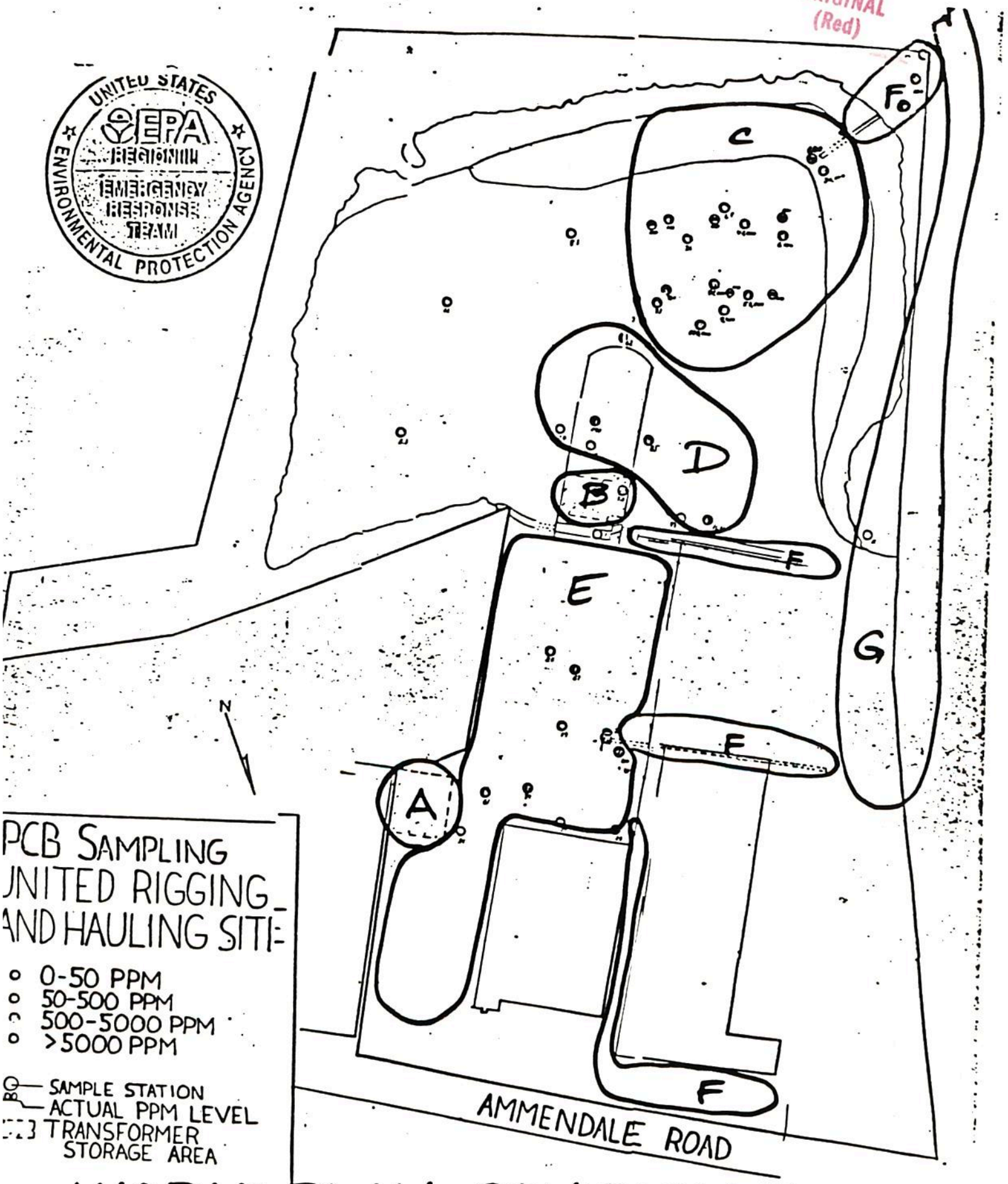
(The Unnamed Creek)

The EPA has performed sediment sampling and has not detected any PCB downstream of the United Rigging site. EPA will perform additional stream study and such other actions it deems appropriate using EPA CERCLA authority and funding.

Balance of the Site

Outside of Areas A - F described above, work on the balance of the site will be limited to the stripping and removal of a small quantity of material from dirt roadways. EPA has preliminarily estimated the quantity of material at approximately 10 cubic yards. No other testing or general soil removal will be done pursuant to this Order.

ORIGINAL
(Red)



PCB SAMPLING
UNITED RIGGING
AND HAULING SITE

- 0-50 PPM
- 50-500 PPM
- 500-5000 PPM
- >5000 PPM

SAMPLE STATION
ACTUAL PPM LEVEL
TRANSFORMER STORAGE AREA

WORK PLAN-REVISION 3

7/16/85

PRELIMINARY
CLEAN-UP SCHEDULE
UNITED RIGGING & HAULING, INC.
SUPERFUND SITE

July 16, 1985

ACTIVITY DESCRIPTION	WEEK NUMBER											
	1	2	3	4	5	6	7	8	9	10	11	12
Prepare Safety Plan & Obtain OSC Approval	X	X										
Prepare SPCC & Obtain OSC Approval	X	X										
Prepare Traffic Control Plan & Obtain OSC Approval	X	X										
Set up Field Office, Generator, etc.	X	X										
Bid and Award Contracts:												
Security	X											
Hazardous Waste Disposal	X	X	X									
Testing Lab	X	X	X									
AREA A												
Remove Mineral Oil Transformers		X	X									
Clean Surface Area Inside Area A Fence				X								
Sample Area A				X								
Remove Contaminated Macadam & Soil					X							
Restore Area A					X							
AREA B												
Remove EEC Transformers from Site				X								
Sample Area B				X								
Remove Contaminated Soil					X							
Restore Area B						X						
AREA C												
Clean and Remove PCB Debris					X							
Sample Area C						X	X					
Prepare 3 Dimensional Contour Map							X					
Remove Contaminated Soil								X	X			
Restore Area C										X		

ORIGINAL (RED)

PRELIMINARY
CLEAN-UP SCHEDULE
UNITED RIGGING & HAULING, INC.
SUPERFUND SITE

July 16, 1985

ACTIVITY DESCRIPTION	WEEK NUMBER											
	1	2	3	4	5	6	7	8	9	10	11	12
AREA D												
Decontaminate & Remove Metal Pieces				X								
Remove & Dispose of Contaminated Trash				X								
Remove Visible Traces of Contaminated Soil					X							
Sample Area D					X							
Remove Remaining Contaminated Soil						X						
Restore Area D							X					
AREA E												
Sample Area E							X					
Remove Contaminated Macadam & Soil								X				
Restore Area E									X			
AREA F												
Decontaminate Drains & Sewer Pipes									X			
Remove Visible Traces of Contaminated Sediment									X			
Sample Remaining Sediments										X		
Remove Contaminated Sediments										X		
Restore Area F											X	
Demobilize Site												X

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